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April 15, 2026

California Independent System Operator

BPM Change Management Team

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SUBJECT: Proposed Revision Request 1665

Vistra requests additional time to review and submit comments on the EDAM BPM. Our hope would be for revised BPM drafts to be published given the review cycles completed and allow an additional round for more detailed review.

At a high-level, Vistra is concerned that some market operation procedures impacting the Integrated Forward Market or Residual Unit Commitment processes are currently in the EDAM BPM instead of in the Market Operations BPM. On initial review, Vistra believed the Market Operations BPM was more deficient than it may be because many market operations elements changing may be in the EDAM BPM, which does not make intuitive sense since Market Operations is where the procedures for operating the markets are supposed to be documented.

In general, the EDAM BPM should be narrow to procedures that are specific EDAM participation not operations. Under EDAM, the CAISO's Market Power Mitigation, Integrated Forward Market, and Residual Unit Commitment are no longer the CAISO but fully convert to EDAM such that market procedures that are currently in EDAM BPM should be in the Market Operations BPM. **Vistra respectfully requests the Market Operation elements of the EDAM BPM draft move into the Market Operations BPM including EDAM BPM Section 3.1, 13.2, 18, 19, 20, 22, 23, 24, and 29.**

As currently drafted, it will be too confusing to have different BPMs describing operations for MPM, IFM, and RUC based on logic that is not apparent or intuitive. From a Market Participant perspective as a main user of the Business Practice Manuals, all Market Operations that pertain to the Day-Ahead Market are now EDAM Market Operations as vice versa and Market Operations is the preferred location for a single set of procedures associated with operating the EDAM (i.e., DAM market).

Vistra has not reviewed the market operations elements in the EDAM BPM draft as this was recently discovered. We respectfully request the CAISO move the market operations information currently in the EDAM BPM draft into an updated Market Operations BPM and allow an additional cycle for reviewing

those sections as well so that we may comment on the DAM market operations elements that were nested into the EDAM BPM such as MPM and GHG among other critical market operating procedures.

One targeted comment on the EDAM BPM draft is that we could not easily find where the EDAM congestion revenue allocation and the impacts to the CRR Hourly Congestion Fund was reflected in the EDAM BPM. We noted in a separate comment that the CRR BPM is missing this information as well. We respectfully ask that the CAISO provide proposed revisions to the CRR BPM and add a high-level summary in the BPM EDAM BPM with a reference to the CRR BPM explanation of EDAM congestion revenues allocated back to EDAM entities impacts on CRRs.